

REMARKS

Claims 1-20 are pending in the application. Claims 7 and 14 were amended. Support for the amendment may be found throughout the specification and drawings. Attached hereto is a marked up version titled "Version with Markings to Show Changes Made."

Claim Rejection – 35 U.S.C. §102(b)

The Examiner rejected Claims 1-4 and 6-20 under 35 U.S.C. §102(b) as being anticipated by Nguyen, U.S. Patent No. 5,477,933. The Applicants respectfully disagree.

The Examiner referenced Nguyen for support of a first configuration and a second configuration, the contacts of the first configuration not arranged with contacts having a corresponding function configured in the second configuration. It is respectfully submitted that the Examiner has misinterpreted "arrangement" of the contacts as claimed in Claim 1, and in amended Claims 7 and 14. Through changing the arrangement of the contacts, a preexisting chip may be utilized for testing and the like of a circuit board, even a chip of the same size of contact area of the circuit board, but having a different arrangement of pins. See FIGS. 1A, 1B, & 3F and related description. Arrangement pertains to pins and the corresponding functionality of the pins with respect to each other, as shown in the following excerpt and shown in FIGS. 1A and 1B:

In this way, an integrated circuit may have a configuration depending on the arrangement of contacts and corresponding functions of the arranged contacts. For instance, a contact 106 may be configured to provide a first function in a first configuration. However, in certain instances it may be desirable to utilize the integrated circuit with a device having a second configuration, which may be incompatible with the first configuration.

For example, as shown in FIG. 1B, a circuit board 110 includes a substrate 112 having a plurality of contacts 114. The contacts 114 are suitable for providing an electrical pathway and contact with contacts 104 disposed on an integrated circuit 100 (FIG. 1A). However, the configuration of the circuit board 110 is different from the integrated circuit 100. For example, a contact 106 (FIG. 1A) having a first function may not be arranged with a corresponding contact 116 having the first function of the circuit board 110. For instance, such as if the integrated circuit was arranged directly on a circuit board so that the corresponding functions did not align. Thus, contacts of the first configuration are out of position with

contacts of a second configuration of the circuit board, making the circuit board and integrated circuit incompatible as configured.
Application, Page 6, Lines 9-24.

Therefore, the positioning of pins and the corresponding functions are different in the first configuration and second configuration, as claimed. However, in the Nguyen reference, the arrangement of the pins with respect to each other is the same, i.e. a pin having a first function arranged next to a pin having a second function is the same in both the circuit and the circuit board. Thus, as stated by Nguyen, a larger array is obtained by the Nguyen reference to enable connection, such as in photodetector arrays. *See Col. 2, Lns. 13-22*. There is no teaching or suggestion in the Nguyen reference for changing the arrangement of the connections in a configuration as claimed. Therefore, it is respectfully submitted that a *prima facie* showing of anticipation has not been established.

Claims 2-4, 6, 8-13 and 15-20 are believed to be allowable based on dependence from an allowable claim.

Withdrawal of the rejections is respectfully requested.

Claim Rejection – 35 U.S.C. §103(a)

The Examiner rejected Claim 5 under 35 U.S.C. §102(b) as being anticipated by Nguyen, U.S. Patent No. 5,477,933. The Applicants respectfully disagree.

As the Examiner correctly stated, Nguyen is silent regarding a converted device having a power layer and a ground layer. However, the Examiner asserts that it would be obvious to make a converter device with a power layer and ground layer, without support in the reference for such a modification. As the Examiner is well aware, the Applicants are required to seasonably challenge statements by the Examiner that are not supported on the record, and failure to do so will be construed as an admission by Applicant that the statement is true. M.P.E.P. §2144.03. Therefore, in accordance with Applicant's duty to seasonably challenge such unsupported statements, the Examiner is hereby requested to cite a reference supporting the position that it would have been obvious to utilize a power layer and a ground layer in a converter device as claimed. If the Examiner is unable to provide such a reference, and is relying on facts based on personal knowledge, Applicant hereby requests that such facts be set forth in an affidavit from the Examiner under 37


C.F.R. 1.104(d)(2). Absent substantiation by the Examiner, it is respectfully requested that the rejection under 35 U.S.C. § 103 be withdrawn.

CONCLUSION

In light of the forgoing, reconsideration and allowance of the claims is earnestly solicited.

Respectfully submitted,
LSI Logic,

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VERSION WITH MARKINGS TO SHOW CHANGES MADE
AMENDMENT

IN THE CLAIMS

Please amend the claims as follows:

7. (Amended) An apparatus, comprising:
- an integrated circuit including a set of contacts, wherein the integrated circuit set of contacts is suitable for operation in a first configuration, the first configuration having an arrangement of contacts and corresponding functions of arranged integrated circuit contacts;
 - a circuit board including a set of contacts, wherein the circuit board set of contacts is suitable for operation in a second configuration, the second configuration having an arrangement of contacts and corresponding functions of arranged circuit board contacts; and
 - a converter device disposed between the integrated circuit and the circuit board, wherein the converter board includes
 - a first set of contacts suitable for contacting the integrated circuit having the first configuration, and
 - a second set of contacts suitable for contacting the circuit board having the second configuration, wherein the first set of contacts is communicatively coupled to the second set of contacts and wherein contacts having a function configured in the first configuration are not arranged with contacts having a corresponding function configured in the second configuration.
14. (Amended) An apparatus, comprising:
- an integrated circuit including a set of contacts, wherein the integrated circuit set of contacts is suitable for operation in a first configuration, the first configuration having an arrangement of contacts and corresponding functions of arranged integrated circuit contacts;

a circuit board including a set of contacts, wherein the circuit board set of contacts is suitable for operation in a second configuration, the second configuration having an arrangement of contacts and corresponding functions of arranged circuit board contacts; and

a converter device disposed between the integrated circuit and the circuit board, wherein the converter device includes a first set of contacts suitable for contacting the integrated circuit having the first configuration and a second set of contacts suitable for contacting the circuit board having the second configuration, the first set of contacts electrically coupled to the second set of contacts, wherein contacts having a function configured in the first configuration are not arranged with contacts having a corresponding function configured in the second configuration

[wherein the integrated circuit set of contacts includes at least one contact having a function corresponding to a function of a contact of the circuit board, the integrated circuit contact positioned so that when the integrated circuit is arranged with the circuit board, the integrated circuit contact is not positioned for electrical coupling to the contact of the circuit board having a corresponding function].